

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 23-CR-20483-ALTMAN

UNITED STATES OF AMERICA

v.

**AVIN SEETARAM,
a/k/a "Smalls,"
SOMJEET CHRISTOPHER SINGH,
a/k/a "Lil Chris,"
GAVIN HUNTER,**

Defendants.

UNITED STATES' BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY

In accordance with Federal Rules of Criminal Procedure 7(f) and 32.2(a), the government files this bill of particulars and gives notice that, in addition to property identified in the Indictment, [ECF No. 17], the United States seeks the forfeiture of the following property under 18 U.S.C. § 982(a)(1)(C) or 21 U.S.C. § 853(p):

1. 2001 truck trailer (VIN# 1JJV532W21L670036);
2. 2005 truck trailer (VIN# 1DW1A53245B755606);
3. 1998 truck trailer (VIN# JJV532F3WF503108);
4. 2007 truck trailer (VIN# 1UYVS25327P199957);
5. 1999 truck trailer (VIN# UYVS2539XM037101);
6. 2012 truck trailer (VIN# 1GRAA0626CT570121); and
7. Approximately three to three-and-one-half trailers worth of 1.4G

Consumer Fireworks and 1.3G Regulated Fireworks.

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 24, 2024, the foregoing document is being filed electronically with the Clerk of the Court using CM/ECF.

/s/ Jorge R. Delgado
Jorge Roberto Delgado
Assistant United States Attorney